

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT GREENEVILLE**

Miguel Angel Cristobal Lopez, et. al.	)	
	)	
Plaintiffs,	)	
	)	
Vs.	)	No. 2:11-cv-113
	)	
Jimmy Carroll Fish d/b/a Fish Farms,	)	
et. al.	)	
	)	
Defendants.	)	

---

**STIPULATED JUDGMENT APPROVING SETTLEMENT AGREEMENT**

---

This cause came before the Court upon the joint motion of the parties to approve a Settlement Agreement and Release of All Claims in the above-captioned matter. The Court, having reviewed the pleadings in this matter, and the proposed Settlement Agreement and Release of All Claims, and the record as a whole, finds for the purposes of this Stipulated Judgment as follows:

1. The Plaintiffs, Miguel Angel Cristobal Lopez, Magdaleno Lorenzo Roman Perez, Octavio Carlos Baro Romero, Arturo Baro Romero, Roberto Calvo Rosales, Mauro Ferrer Santiago, Abraham Ocampo Bahena, Vicente Pedraza Reza, Luis Roberto Rogel Hernandez, Ismael Ruiz Zeferino, Giovanni Sanchez Hernandez, Miguel Angel Sierra Everlastico, Guillermo Ruiz Zeferino, Juan Calderon-Langunas, brought this suit solely for themselves, and not on behalf of a class or any other similarly situated person.

2. This Court, upon motion by the former Plaintiff, Francisco Javier Rogel Bedolla, has dismissed his claims against the Defendants with full and final prejudice to the re-filing of the same

and he is no longer a party to this Lawsuit.

3. The parties have agreed upon a compromised settlement of this matter, the terms of which are set forth in a Settlement Agreement and Release of All Claims.

4. The Court finds that Plaintiffs' claims are *bona fide* disputed claims. The Court finds that the parties are willing and desirous of settling the claims on the basis set forth in the Settlement Agreement and Release of All Claims. In the opinion of the Court, the Settlement Agreement and Release of All Claims represents a good faith, fair and reasonable resolution of the *bona fide* disputes between the parties and secures to the Plaintiffs in a substantial manner their rights under the Fair Labor Standards Act; 42 U.S.C. §1981; the Tennessee Public Protection Act; the Tennessee Human Rights Act; and the common-law of Tennessee.

**IT IS THEREFORE ORDERED** that the Settlement Agreement and Release of All Claims proposed by the parties be and the same is in all respects approved by the Court. Once Defendants have made all payments to Plaintiffs and their attorneys described in paragraph 2 of the Settlement Agreement, the parties will submit an executed Order of Dismissal which will be entered by the Court dismissing this action with full prejudice with each party to bear their own costs, including all discretionary costs and attorneys' fees. A copy of the Order of Dismissal that will be entered by the Court and executed by the parties at that time is attached hereto as *Exhibit A*. The Court will retain jurisdiction over the parties to enforce the Settlement Agreement if necessary.

**ENTERED:**

---

Hon. J. Ronnie Greer  
U.S. District Judge

APPROVED FOR ENTRY:

HUGHES, SOCOL, PIERS, RESNICK  
& DYM, LTD.

By: s/Caryn Lederer, with permission

Matthew J. Piers, Illinois Bar #2206161

Joshua Karsh, Illinois Bar #6203096

Caryn Lederer, Illinois Bar #630449

**Attorneys for Plaintiffs**

70 W. Madison Street, Ste. 4000

Chicago, IL 60602

Telephone: (312) 580-0100

Fax: (312) 580-1994

SOUTHERN MIGRANT LEGAL SERVICES

By: s/Caitlin Berberich, with permission

Caitlin Berberich, BPR #025780

**Attorneys for Plaintiffs**

311 Plus Park Blvd., Suite 135

Nashville, TN 37217

Telephone: (615) 750-1200

Fax: (615) 366-3349

ARNETT, DRAPER & HAGOOD

By: s/Jay W. Mader

Dan D. Rhea, BPR #005927

Jay W. Mader, BPR #016199

Stacie D. Miller, BPR #024155

**Attorneys for Defendants**

**Jimmy Carroll Fish d/b/a Fish Farms,**

**Walter Jackson Fish d/b/a Fish Farms,**

**and Christine Fish Gilliam d/b/a Fish Farms**

P. O. Box 300

Knoxville, Tennessee 37901-0300

(865) 546-7000 - Voice

(865) 546-0423 - Facsimile